SEALED

CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America v. Ahmad Suhad Ahmad DOB: 1988; U.S. Citizen	DOCKET NO. 18-00784MJ MAGISTRATE'S CASE NO.

Complaint for violation of Title 18, United States Code, Section 842(p)(2)(B)
Distribution of Information Relating to Explosives, Destructive Devices and Weapons of Mass Destruction

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

From on or about March 24, 2017, to on or about April 26, 2017, at or near Tucson, and elsewhere, in the District of Arizona, AHMAD SUHAD AHMAD, did teach and demonstrate to another person the making and use of an explosive, destructive device, or weapon of mass destruction, and did distribute to another person, by any means, information pertaining to, in whole or in part, the manufacture or use of an explosive, destructive device, or weapon of mass destruction, in that AHMAD SUHAD AHMAD provided an individual with homemade bomb recipes and taught an individual how to construct remote-detonating bombs, knowing that such individuals intended to use such information for, and in furtherance of, activities which constituted a federal crime of violence, to wit, Title 18, United States Code, Section 2232a.

All in violation of Title 18, United States Code, Section 842(p)(2)(B).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On December 22, 2016, Ahmad Suhad Ahmad (Ahmad) told a confidential source (CS3) he knew how to detonate a bomb by using a cellular phone with a removable cellular battery. Ahmad described how he learned this during the war in Iraq. Ahmad said the bombs were easy to make. On April 4, 2017, Ahmad met with CS3 at CS3's apartment. CS3 asked Ahmad to show him how to make a car bomb for a target in Mexico, to which Ahmad agreed. Between April 4, 2017, and April 26, 2017, Ahmad met on numerous occasions with CS3, CS4, and multiple undercover FBI agents in Tucson to discuss the plans for building the bomb.

On April 11, 2017, Ahmad showed CS3 an image of explosive materials and instructions on his cellphone. Ahmad explained the instructions were in Arabic, not in English. On April 13, 2017, Ahmad showed CS3 homemade bomb instructions on his cellphone and promised to translate them. On April 16, 2017, Ahmad met inside CS3's vehicle at Ahmad's apartment complex in Tucson. Ahmad explained some of the equipment he would need to build the bomb and that he had been studying up on how to build the explosive. Ahmad sent CS3 a text message with a bomb recipe written in Arabic. The recipe consisted of a multi-step process to make a land mine or improvised explosive device (IED). On April 19, 2017, Ahmad met with CS3 and an undercover agent at CS3's apartment to finalize plans to make the bomb. As part of the plan, Ahmad agreed to travel to Las Vegas, Nevada, to build the device.

CONTINUED ON REVERSE

MATERIAL WITNESSES IN RELATION TO THE CHARGE:

DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED AUSA Kevin C. Hakala KCH	SIGNATURE OF COMPLAINANT (official title) SA. OFFICIAL TITLE Christopher T. Barrett FBI Special Agent

Sworn to before me and subscribed in my presence.

SIGNATURE OF MAGISTRATE JUDGE[1]	DATE October 26, 2018

[1] See Federal Rules of Criminal Procedure Rules 3 and 54

cc: AUSA

18-00784MJ

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On April 26, 2017, Ahmad, CS3, CS4, and two undercover FBI agents travelled from Tucson, Arizona, to Las Vegas, Nevada. Ahmad brought along a number of his own items to assist in constructing the bomb, including a circuit tester, electrical tape, and tubes of Permatex Epoxy. The undercover agents brought the other items required to build the bomb, which were obtained from a list provided by Ahmad. Once they were in Las Vegas, they all went to a condominium. Over the course of several hours, Ahmad built the device and described what he was doing to one of the undercover agents. Ahmad showed one of the agents how to connect the blasting caps and where to place the C-4. Ahmad then guided the undercover agent on how to make a second device. Once both devices were completed, Ahmad explained how they operated.